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Attorneys for Chapter 7 Trustee,
William A. Leonard, Jr.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

ASSET RESOLUTION, LLC

Debtor.

Case No.: BK-S-09-32824-RCJ

Chapter 7

Current Date: February 22, 2021
Current Time: 10:00 a.m.

Requested Date: March 22, 2021
Requested Time: 10:00 a.m.

STIPULATION TO CONTINUE FEBRUARY 22, 2021 HEARING

This stipulation is entered into between the United States of America and William A. Leonard, Jr., Chapter 7 Trustee, by their respective attorneys, to continue the hearing on the Chapter 7 Trustee's Objection to Claim Nos. 13-1 and 13-2.

The Chapter 7 Trustee filed an Objection to Claim Nos. 13-1 and 13-2. On July 24, 2020 the United States filed a response to the Objection. Hearing on the objection is presently set for February 22, 2021.

The Claim arises out of the Debtor's 2008 tax return and taxes claimed to be due by reason of such return. The Trustee's accountants have located in the debtor's books and records an amended 2008 return, prepared by the Debtor's then accountants. It is unclear whether the return was filed with the Internal Revenue Service (IRS). The amended return reflects that no tax was due for tax year 2008. The Trustee provided a copy of the amended return to the IRS and the

1 IRS suggested that the Trustee file an amended return so it may be processed by the IRS and that
2 its processing may resolve, in whole or in part, the Claim asserted by the IRS. The Trustee's
3 accountants prepared an amended return, which the Trustee signed and filed. The amended
4 return is now being reviewed by the IRS.

5 The parties therefore request the current hearing date of February 22, 2021 be continued,
6 to permit additional time for the return to be processed.

7 All parties reserve their rights with respect to the claim and the pending objection.

8 THEREFORE, IT IS HEREBY AGREED AND STIPULATED:

9 The hearing date on the Chapter 7 Trustee's Objection to Claim Nos. 13-1 and 13-2,
10 presently scheduled for February 22, 2021, may be reset to March 22, 2021 or the first date
11 thereafter convenient to the Court.

12 NICHOLAS A. TRUTANICH
13 United States Attorney

14 /s/ Brian W. Irvin
15 BRIAN W. IRVIN
16 Assistant United States Attorney

17 SULLIVAN HILLREZ & ENGEL
18 A Professional Law Corporation
19 By: /s/ Jonathan S. Dabbieri
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24 William A. Leonard, Jr.
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Attorneys for Chapter 7 Trustee,
 William A. Leonard, Jr.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re) CASE NO. BK-S-09-32824-RCJ (Lead Case)
)
 ASSET RESOLUTION, LLC,) Jointly Administered with Case Nos.:
) BK-S-09-32831-RCJ; BK-S-09-32839-RCJ;
 Debtor.) BK-S-09-32843-RCJ; BK-S-09-32844-RCJ;
) BK-S-09-32846-RCJ; BK-S-09-32849-RCJ;
) BK-S-09-32851-RCJ; BK-S-09-32853-RCJ;
) BK-S-09-32868-RCJ; BK-S-09-32873-RCJ;
) BK-S-09-32875-RCJ; BK-S-09-32878-RCJ;
) BK-S-09-32880-RCJ; BK-S-09-32882-RCJ
)
) Chapter 7

Affects:

- ☒ All Debtors
☒ Asset Resolution, LLC, 09-32824
☐ Bundy 2.5 Million SPE, LLC, 09-32831
☐ Bundy Five Million SPE, LLC, 09-32839
☐ CFP Anchor B SPE, LLC, 09-32843
☐ CFP Cornman Toltec SPE, LLC, 09-32844
☐ CFP Gess SPE LLC, 09-32846
☐ CFP Gramercy SPE, LLC, 09-32849
☐ Fiesta Stoneridge, LLC, 09-32851
☐ Fox Hills SPE, LLC, 09-32853
☐ HFAH Monaco SPE LLC, 09-32868
☐ Huntsville SPE LLC, 09-32873
☐ Lake Helen Partners SPE LLC, 09-32875
☐ Ocean Atlantic SPE LLC, 09-32878
☐ Shamrock SPE LLC, 09-32880
☐ 10-90 SPE, LLC, 09-32882

CERTIFICATE OF SERVICE

Ctrm: RCJ - Courtroom 6
 Bruce R. Thompson Federal Building
 400 S. Virginia Street
 Reno, NV 89501
 Judge: Hon. Robert C. Jones

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I am employed in San Diego County. I am over the age of 18 and not a party to this action. My business address is 600 B Street, Suite 1700, San Diego, California 92101. On February 17, 2021, I served the foregoing document(s), described as:

1. STIPULATION TO CONTINUE FEBRUARY 22, 2021 HEARING

☒ by placing ☐ the original ☒ a true copy thereof, by the following means to the persons as listed below:

☒ **ECF SYSTEM** On February 17, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive ECF transmission at the email address(es) indicated below:

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☐ **UNITED STATES MAIL, postage fully prepaid** (*List persons and addresses. Attach additional paper if necessary*)

☐ **BY DIRECT E-MAIL (as opposed to through the ECF System)** (*List persons and email addresses. Attach additional paper if necessary.*) Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
February 17, 2021 at San Diego, California.

/s/ Linda Gubba-Reiner

Linda Gubba-Reiner